

No. PD-0585-21

DANIELLE EDWARDS

VS.

STATE OF TEXAS

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§  
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§

IN THE COURT OF  
CRIMINAL APPEALS  
OF TEXAS

FILED  
COURT OF CRIMINAL APPEALS  
11/30/2021  
DEANA WILLIAMSON, CLERK

**MOTION TO EXTEND TIME TO FILE APPELLANT'S BRIEF**

**TO THE HONORABLE JUDGES OF SAID COURT:**

Now comes Danielle Edwards, Appellant in the above styled and numbered cause, and moves for an extension of time to file Appellant's brief, and for good cause shows the following:

1. On July 1, 2021, the Third Court of Appeals affirmed the trial court's judgment of conviction. *Danielle Edwards v. State*, 03-20-00138-CR. No motion for rehearing was filed. The Petition for Discretionary Review was therefore due on July 31, 2021. Motions to extend time to file the Petition for Discretionary Review were granted and the PDR was filed on September 7, 2021. The PDR was granted on October 27, 2021 and Appellant's brief is therefore due on November 26, 2021.

2. Counsel for Appellant has been preparing for trial in *State v. Matthew Sanders*, No. 18-257, in the District Court of Caldwell County, set for November 29, 2021. Counsel has not had sufficient time to complete the brief in this cause.

3. Appellant is in custody.

**WHEREFORE, PREMISES CONSIDERED,** Appellant respectfully requests an extension of thirty days, to December 24, 2021, to file this petition for discretionary review.

Respectfully submitted,  
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By: /s/ Susan Schoon  
Susan Schoon  
State Bar No. 24046803  
Attorney for Danielle Edwards

**CERTIFICATE OF SERVICE**

This is to certify that on November 24, 2021, a true and correct copy of the above and foregoing document was served on the District Attorney's Office, Caldwell County, Texas and the State Prosecuting Attorney via email service.

/s/ Susan Schoon  
Susan Schoon

### **Automated Certificate of eService**

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Leanne Jones on behalf of Susan Schoon  
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Status as of 11/30/2021 9:50 AM CST

Associated Case Party: StateofTexas

Name	BarNumber	Email	TimestampSubmitted	Status
Stacey Soule		stacey.soule@spa.texas.gov	11/24/2021 11:02:37 PM	SENT
Chase Goetz		chase.goetz@co.caldwell.tx.us	11/24/2021 11:02:37 PM	SENT